

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 03-12306-MLW

KENNETH AND PAMELA PRICE JEAN,	)
Plaintiffs	)
	)
vs.	)
	)
CITY OF ASHBURNHAM POLICE	)
DEPARTMENT, CITY OF WINCHENDON	)
POLICE DEPARTMENT,	)
ROB HARRINGTON, in his capacity as	)
CHIEF OF THE WINCHENDON POLICE	)
DEPARTMENT, JACK MURRY, in his capacity	)
as CHIEF OF THE ASHBURNHAM POLICE	)
DEPARTMENT, TODD C. PARSONS,	)
RAYMOND M. ANAIR, ROBERT BRENNON,	)
WILLIAM P. GEOFFROY, BRIAN HART,	)
KEVIN AHEARN, KEVIN E. WOLSKI	)
OFFICER JOHN DOE, OFFICER JOHN DOE,	)
Defendants	)

**DEFENDANTS, CITY OF WINCHENDON POLICE DEPARTMENT,**  
**WILLIAM P. GEOFFROY, KEVIN E. WOLSKI, RAYMOND M. ANAIR**  
**AND ROB HARRINGTON'S, MOTION FOR TRANSFER**

NOW COME the defendants in the above-captioned matter and move this court, pursuant to Rule 40.1(D)(1) and 40.1(F) to transfer the above-captioned matter to the United States District Court, for the District of Massachusetts, Central Division. As grounds therefor and in support thereof, the defendants state that as reflected in the plaintiffs' complaint, the plaintiffs herein are individuals with a usual residence in Ashburnham, Worcester County, Massachusetts. The two defendant municipalities are also located in Worcester County and the remaining defendants are all employees of the respective municipalities. As such, all parties "reside" in the Central Division. Local Rule 41.1(D)(1)(a) thus mandates assignment to the Central Division.

Further, Local Rule 40.1(F) authorizes transfer of the case within the Divisions under such circumstances.

WHEREFORE, based upon the foregoing, the defendants, City of Winchendon Police Department, William P. Geoffroy, Kevin E. Wolski, Raymond M. Anair and Rob Harrington, respectfully request that this court transfer the above-captioned matter to the Central Division of the United States District Court as mandated by Local Rule 40.1.

Respectfully submitted,

THE DEFENDANTS  
CITY OF WINCHENDON POLICE  
DEPARTMENT, WILLIAM P.  
GEOFFREY, KEVIN E. WOLSKI,  
RAYMOND M. ANAIR AND  
ROB HARRINGTON

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